

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, On Behalf of Herself and All)
Others Similarly Situated,) Case No. 04 cv 10294 (DPW)
)
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., et al.)
)
Defendants.)
_____)

DANIEL WILLIAMS,)
)
Plaintiff,)
)
v.) Case No. 04 cv 10359
)
)
HASSAN M. AHMED, et al.,)
)
Defendants,)
)
v.)
)
SONUS NETWORKS, INC.,)
_____)

THIS DOCUMENT RELATES TO CASE NOS.:

04 cv 10307; 04 cv 10308; 04 cv 10309;
04 cv 10310; 04 cv 10329; 04 cv 10333;
04 cv 10345; 04 cv 10346; 04 cv 10359;
04 cv 10362; 04 cv 10363; 04 cv 10364;
04 cv 10382; 04 cv 10383; 04 cv 10384;
04 cv 10454; 04 cv 10576; 04 cv 10597;
04 cv 10612; 04 cv 10623; 04 cv 10714;
04 cv 10314 (MLW); 04 cv 11315 (MLW)

PLAINTIFF DANIEL WILLIAMS' (1) RESPONSE TO THE MOTION OF CHRIS E. PATERICK FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF CLASS COUNSEL, AND (2) MOTION FOR APPOINTMENT OF LEAD COUNSEL FOR SHAREHOLDER DERIVATIVE ACTION

Plaintiff Daniel Williams (“Williams”), plaintiff in the derivative action styled *Williams v. Ahmed, et al.*, Case No. 04 cv 10359 (the “*Williams* action”, “derivative action” or “*Williams* derivative action”) hereby (1) responds to the Motion of Chris E. Paterick (“Paterick”) for Consolidation, Appointment of Lead Plaintiff and Approval of Lead Counsel and (2) moves this Court for an Order appointing Williams’ selection of the law firm of Federman & Sherwood (“F&S”) to serve as Lead Derivative Counsel and the Law Office of Alan L. Kovacs (“Kovacs”) to serve as Liaison Derivative Counsel in the following three (3) related derivative actions, and any subsequently-filed derivative actions.

Williams v. Ahmed, et al., Case No. 04 cv 10359

Burk v. Ahmed, et al., Case No. 01 cv 20384

Pisnoy v. Ahmed, et al., Case No. 104 cv 10576

This Response and Motion is supported by the accompanying Memorandum of Law, the Exhibits attached thereto, all of the prior pleadings and proceedings herein, and such other written and/or oral argument, as may be presented to the Court.

Date: April 27, 2004

Daniel Williams,

By his Attorneys,

/s/ Alan L. Kovacs

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the instant motion and the above-identified supporting documents were delivered electronically and via facsimile on April 27, 2004 to counsel identified on the attached Service List.

/s/ Alan L. Kovacs

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